

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE
Plaintiff

vs.

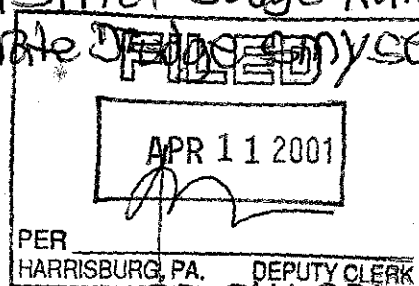
KENNETH D. KYLER et al.
Defendants.

CIVIL No. 12 CK 0013

U.S. District Judge Rambo

ORIGINAL

Magistrate Judge [Signature]



MOTION FOR LEAVE OF COURT TO FILE A REPLY BRIEF
IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT AND MEMORANDUM OF LAW
IN SUPPORT WHICH EXCEEDS THE FIFTEEN (15) PAGE
ALLOWABLE LIMIT UNDER DLR 7.8 AND BRIEF IN SUPPORT

COMES NOW the Plaintiff & his counsel in the above
civil action, John Richard Jae, as a layman unlettered in the
sciences of the laws & legal procedures within the US
& now files his Motion for leave of court to file a Reply Brief
Opposition to Defendants' Motion for Summary Judgment and Memorandum
of Law in support which exceeds the fifteen (15) page allowable
limit under DLR 7.8 and Brief in support, hereto, which are as follows:

1. On or about October 17, 2000, Defendants, by
filing their Motion for Summary Judgment and Statement
of Undisputed Facts, herein this case.

2. On or about December 5, 2000, Defendants, by
filing their Memorandum of Law in support of and Document
supporting Motion for Summary Judgment, herein

3. This is the Plaintiff's Motion for Leave of Court
to file a Reply Brief in opposition to Defendants' Motion for Summary
Judgment and Memorandum of Law in support which exceeds the fifteen (15)
page allowable limit under DLR 7.8 and Brief in support.

BRIEF IN SUPPORT

● M.D. LR 7.8 of this Court requires a Party seeking to file a Brief or Reply Brief which exceeds fifteen (15) pages to state the length of the Brief requested and in accordance with such, this Plaintiff states that the length of his Brief In Opposition To Defendant's Motion For Summary Judgment And Memorandum Of Law In Support is thirty-eight (38) pages.

This Court will benefit from a more extensive argument for the Plaintiff than can be accomplished in just fifteen pages.

Furthermore, in order to fully address & combat Defendant's claims and arguments of their Memorandum Of Law In Support Motion For Summary Judgment, Plaintiff's argument had to be thirty-eight (38) pages and requiring the Plaintiff to file a number of pages of argument would deny him his right to adequately address & combat Defendant's claims & arguments therefore would illegally deny him his 14th Amendment U.S. Constitutional Rights to due process of the law.

This Court has previously allowed this Plaintiff to file Reply Briefs totaling fifty (50) pages in Jae vs. Long, No. 1:CK-99-00719 (US) Party - five pages in Jae vs. Laska, 1:CK-99-1610 and previously herein this instant case, permitted this Plaintiff to file a Reply Brief containing argument.

(W) HEREOF, Plaintiff John Richard Jae, prays that the Court will grant this Motion in full:

AND HE SHALL EVER FULLY
RESPECTFULLY SUBMIT

John Richard Jae
MR. JOHN RICHARD JAE

Dated: 3rd APRIL 2001: (S)

BQ-3219
SCT - Greene/SMU
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Greenville, SC 29615